

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

S.R.J.F., INC., on behalf of itself and all others similarly situated, Plaintiff, v. DAIRY FARMERS OF AMERICA, INC., Defendant.	Civil Action No. 2:22-cv-0147-cr
--	---

**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANT DAIRY FARMERS OF
AMERICA, INC. TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Dairy Farmers of America, Inc. (“DFA”), by and through the undersigned counsel, hereby moves this Court to extend DFA’s time to respond to the Complaint by S.R.J.F., Inc. (“SRJF”) in the above captioned matter, as follows: to September 21, 2022, if by a motion to dismiss under Rule 12 of the Federal Rules of Civil Procedure, or to October 5, 2022, if by an answer. Lead counsel for DFA is currently preparing for an expedited trial in another matter poised to end on September 16, 2022, and other key client personnel are also unavailable during additional time in August and September of 2022. An extension is warranted to provide DFA’s counsel time to confer with its client regarding the facts of this case and respond to the Complaint in light of counsel’s other obligations. Counsel for DFA has conferred with counsel for Plaintiff and is authorized to state that Plaintiff does not oppose this extension.

For these reasons, DFA respectfully requests that the Court extend the time for DFA to respond to Plaintiff’s Complaint to September 21, 2022, if by a motion to dismiss under Rule 12 of the Federal Rules of Civil Procedure, or to October 5, 2022, if by an answer.

Dated: August 19, 2022

Respectfully submitted,

By: /s/ Ian P. Carleton

SHEEHEY FURLONG & BEHM P.C.

30 Main Street, P.O. Box 66

Burlington, VT 05402-0066

Telephone: 802-864-9891

Email: icarleton@sheeheyvt.com

Alfred C. Pfeiffer Jr. (*pro hac vice* forthcoming)

Sarah M. Ray (*pro hac vice* forthcoming)

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Telephone: 415-391-0600

Facsimile: 415-395-8095

Email: al.pfeiffer@lw.com

Email: sarah.ray@lw.com

W. Todd Miller (*pro hac vice* forthcoming)

BAKER & MILLER PLLC

2401 Pennsylvania Avenue, NW, Suite 300

Washington, DC 20037

Telephone: 202-663-7820

Facsimile: 202-663-7849

Email: tmiller@bakerandmiller.com

*Counsel for Defendant Dairy Farmers of
America, Inc.*